

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested. Claims 1-6 are presently active, Claims 1, 4, and 6 having been amended by the present amendment.

In the Office Action, Claims 1, 2, 4, 5, and 6 are rejected under 35 U.S.C. §103(a) as unpatentable over Walker et al (U.S. Pat. No. 6,199,014) in view of Fukushima et al (U.S. Pat. No. 4,807,157). Claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Walker et al (U.S. Pat. No. 6,199,014) in view of Fukushima et al (U.S. Pat. No. 4,807,157) and further in view of Bradshaw et al (U.S. Pat. No. 5,528,518).

Independent Claim 1 defines an image pickup apparatus having location information acquiring means for acquiring current location information, image pickup means for capturing an captured image of a desired object and outputting the captured image, associating means for automatically relating the captured image to the current location information and outputting information about *route relations* as management data, and recording means for recording the captured image, the current location information, and the management data to a removable solid-state storage medium.

As such, in the image pickup apparatus of Claim 1, image data route information (e.g., the location information) and corresponding management data associated with the route relations are recorded in a removable solid-state storage medium (e.g., an IC card) automatically relating the image data to points along the route with location information. The management data can include for example addresses of files recorded in the specific user areas (i.e. at points along the route), dates and times of recording, information about files

recorded in different user areas along the route, remaining storage capacity, and so on.<sup>1</sup> As a consequence, a number of sheets along a corresponding route and the associated picture, as shown in Applicants' Figure 7, can be stored with the management data permitting information such as that shown in Applicants' Figure 7 to be displayed, permitting a user to have access to comprehensive information along the route.<sup>2</sup>

Walker et al disclose a navigation system for guiding one in route to a destination.<sup>3</sup>

Walker et al disclose specifically that:

This invention allows computer-generated driving directions to include photographs of important intersections and landmarks along the way. The system includes a database of photographs taken from several angles: for example, a four-way intersection would require a photograph for each of the four directions from which it can be approached. The system *sequences these photographs and combines them with a set of driving directions* (for example, "drive three miles to this intersection, and turn left on Peachtree Street") that, taken together, guide the user to his or her destination. The photographs help the user recognize when he or she is on the correct route, and also help eliminate ambiguities that might be present in the written directions. (For example, there are dozens of streets called Peachtree in Atlanta, but thanks to the photographs, the user knows he or she needs to turn on the Peachtree Street that has a particular business on the corner).<sup>4</sup> [emphasis added]

Thus, it is understood that Walker et al disclose a system which uses a stored archive of photographs, each photograph associated with a particular junction in a trip, and recalls from the database those photographs appropriate for each junction.

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<sup>1</sup>Specification, page 8, line 19, to page 9, line 10, and Figure 5.

<sup>2</sup>Id., page 10, line 12, to page 11, line 3.

<sup>3</sup>Walker et al, Abstract, lines 1-3, which indicate a system for providing navigational instructions along a route to be traveled.

<sup>4</sup>Id., col. 4, line 59, to col. 5, line 7.

Accordingly, it is respectfully submitted that Walker et al do not disclose associating means for automatically relating the captured image to the current location information and outputting information about route relations as management data, as defined in presently amended Claim 1. Rather, as disclosed in Walker et al, the photography database is recorded by a photographer both taking a photograph and recording the absolute coordinates where the photograph is taken.<sup>5</sup> There is no disclosure or suggestion in Walker et al for either automatically relating the captured image to the current location information or outputting information about route relations as management data. Accordingly, there is no disclosure or suggestion in Walker et al for recording means for recording the captured image, the current location information, and the management data to a storage medium.

Furthermore, the teachings of Fukushima et al cited for its teaching of storing navigational information on an IC card were considered, but were deemed no more pertinent to the question of patentability for Claim 1 than the teachings of Walker et al.

Applicants respectfully submit that the features defined in the image pickup apparatus of Claim 1 for automatically relating the image data to current location information, for outputting information about route relations as management data, and for recording on a removable media the associated captured image, current location information, and the management data are not disclosed or suggested by Walker et al or Fukushima et al either individually or in combination.

M.P.E.P. §2143.03 requires for *prima facie* obviousness that all claim limitations be taught or suggested. With no teaching or suggestion in the applied prior art for the above-

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<sup>5</sup>Walker et al, col. 6, line 65, to col. 7, line 8.

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noted features, it is respectfully submitted that independent Claim 1 and the claims dependent therefrom patentably define over the applied prior art.

Similarly, independent Claim 4 defines a navigation apparatus that includes associated means for automatically relating the route information to image data, updating information about *route relations* as management data in the removable storage medium, and outputting the image data and the management data recorded in the removable storage medium in conjunction with the route information. Likewise, Claim 6 defines an IC card inserted into a navigation apparatus providing guidance regarding a route to a destination so as to store information about the route. In the IC card, image data and information about *route relations* as management data related to the route are recorded in the IC card in correspondence with locations along the route.

Thus, for reasons similar to those given with regard to Claim 1, Claims 4 and 6, and Claim 5 which depends from Claim 4, are believed to patentably define over the applied prior art.

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Consequently, in view of the present amendment and in light of the above discussions, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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